

**HUNTERS POINT NAVAL SHIPYARD
BASE REALIGNMENT AND CLOSURE CLEANUP TEAM
MEETING NOTES**

July 9, 2020

These notes summarize the Navy Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting for Hunters Point Naval Shipyard (HPNS) in San Francisco, California. The meeting was held on July 9, 2020 via teleconference.

I. Introductions and Agenda Review

Mr. Derek Robinson (Navy) performed introductions and reviewed the action items from the June 11, 2020 BCT meeting.

II. Navy Business/Action Items (Derek Robinson, Navy)

The following is a summary of the status of the action items from the June 11, 2020 BCT provided by Mr. Robinson (Navy):

Item	Description	Status
1	The Navy will set up a call with the BCT regarding radiological dust monitoring during onsite activities.	Ongoing. Meeting with USEPA held on 3/31/20; crosswalk provided on 5/1/20. EPA provided comments on 5/22/20.
2	The Navy will set up a call with the BCT regarding the path forward at Parcel B IR-26.	Pending
3	The BCT will submit specific requests concerning the S3 soil sorting demonstrations and their respective area of interest by May 15, 2020.	Complete
5	The Navy will provide a weekly Parcel E field update to the BCT for the next four weeks.	Pending
6	The BCT will email the Navy regarding traveling to San Diego in September.	Complete, per July BCT meeting

Mr. Leo Larson (Navy) discussed weekly updates for Parcel E.

Ms. Nina Bacey (Department of Toxic Substances Control [DTSC]) asked that the BCT also receive weekly Parcel ~~C-E~~ fieldwork updates. Mr. Leo Larson (Navy) noted that they will do a 4-week fieldwork look ahead for the parcels.

III. Document Tracking/Upcoming Fieldwork (Paul Stoick, Navy)

Mr. Paul Stoick (Navy) noted that current documents under regulatory review include the draft remedial action work plan for Phase III Parcel C, the draft interim remedial action completion report for Parcel C Phase I, the Parcel D-1 Explanation of Significant Differences (ESD) and

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revised Land Use Control Remedial Design (LUC RD), the Parcel E-2 Phase II remedial action completion report, and the draft Parcel F Submarine Pens Scoping Survey.

Mr. Robinson (Navy) noted that the Navy submitted the draft Parcel LUC RD for regulatory review anticipating minimal change in the conclusions. He reasoned that regardless of how the ESD document is handled within the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process, it will have limited impact on the LUC RD. Ms. Amy Brownell (City of San Francisco) noted that in her opinion there is language included within each document that needs to be identical and it would be helpful to review and work on both documents concurrently. Ms. Bacey (DTSC) noted that she will review the language in the LUC RD as it relates to the ESD but she thinks the LUC RD should be put on hold until the BCT receives the response to agency comments from the Navy. Ms. Karen Ueno (U.S. Environmental Protection Agency [USEPA]) noted that the BCT has not yet decided if the document will be an ESD or a Record of Decision (ROD) Amendment. As a result, she ~~she~~ thinks the LUC RD should be put on hold until after public participation on the ESD (or ROD Amendment) document. Ms. Ueno also added she would request a 30-day extension on the draft ESD justification to August 26, 2020. Per discussion with the BCT, the Navy will request an extension to the Draft LUC RD to October 1, 2020. Ms. Ueno stated the public comment process should be a meaningful opportunity that should also inform the Draft LUC RD; therefore, the Draft LUC RD should follow the public comment period on the ESD (or ROD Amendment). At this time, it is uncertain when the public comment period will commence and whether it will end before October 1. EPA understands October 1 to be an estimated date that can be revised, as appropriate.

Ms. Leslie Howard (Navy) confirmed that responses to agency comments were submitted with the draft final Parcel E-2 remedial action completion report. Ms. Bacey (DTSC) noted that she hasn't received the document yet. The Navy will resend the document to DTSC.

The BCT agreed the comment period is 30 days after the agencies receive all the documents. A concern over document file sizes was discussed. Members of the BCT noted that they have trouble downloading documents and attachments that are greater than 100 megabytes. A request was made that the Navy break down the documents into smaller pieces and use the Navy's document transfer portal in the future.

Ms. Bacey (DTSC) noted that three of the draft radiological rework work plans (Parcel B, C, and E) are coming out at the same time and the agencies will not be able to review all three concurrently in a timely manner. The Navy agreed to request extensions on the rework work plans based on the priority for cleanup by parcel. The Navy noted all the work plans will be very similar to each other and asserted they will be flexible with the agencies should additional review time be necessary.

Ms. Yolanda Sanchez (USEPA) requested a status on the finalized Parcel C Phase II remedial action work plan, as it was deleted from the document tracking matrix. Ms. Sanchez understood the document was still under informal dispute, therefore is not finalized. Mr. Stoick (Navy) noted that the document is no longer in informal dispute because the Navy has agreed to provide another work plan that will focus on characterization of the deep-water aquifer on Parcel C. DTSC suggested and EPA agreed that informal dispute resolution is still being discussed at a higher level by the Parties (EPA, Water Board, DTSC, Navy), and EPA will check on agency status. The Navy will follow up with the BCT regarding the status and path forward on this document.

IV. Miscellaneous Topics/Update (Derek Robinson)

Ms. Yolanda Sanchez (USEPA) requested BCT meeting materials be provided with more time in advance of the meeting. The FFA notes the Navy will share materials one week in advance. The BCT agreed it would be helpful if the information was provided at least four business days in advance of the meeting.

Mr. Wayne Praskins (USEPA) asked for an update on the proof of concept testing for the soil sorter and its ability to detect cesium-137. Mr. Leo Larson (Navy) ~~asserted said~~ that they are finalizing the pre-operation testing report for the soil sorter and that it will include an analysis of cesium-137 detections and provide recommendations. ~~He noted that the Navy is having trouble finding onsite soil to use for the proof-of-concept testing for cesium-137. Furthermore, the process will need to better account for background levels within the parcels, allowing for a more realistic cesium-137 screening value. The Parcel E work plan will allow the Navy to use the background levels established for HPNS by the most recent background study.~~ Mr. Praskins (USEPA) noted that it would be good for the agencies to understand the alarm level for cesium-137 soil sorter and how it's programmed to alarm. The Navy agreed to host a call with EPA and CDPH to further discuss. ~~The Navy asserted this information will be included in the pre-operational testing report.~~ Ms. Bacey (DTSC) asked at what level the background setting for radium-226 is set. Mr. Larson (Navy) said that it is set at one plus background value. Mr. Larson (Navy) noted that to date they have only processed 500 cubic yards of the expected 10,000 cubic yards of soil scheduled for proof of concept testing. Approximately three yards of soil, of the 500 cubic yards processed, was cleared. The remainder (about 497 cubic yards) was diverted due to the ROL 3 (cesium-137) alarm on the soil sorter, and therefore not cleared. The Navy agreed to forward a video of the soil sorting machine to the BCT to evaluate the dust controls measures.

Commented [PW1]: Please confirm with Leo that that's what he said. And perhaps clarify what is meant by "cesium-137 detections" and "recommendations." My understanding is that the pre-operational report was not expected to include any laboratory sampling results.

Commented [PW2]: I heard Leo say that the Navy was having trouble generating clean soil, not having trouble finding soil to use for the proof-of-concept testing. That is covered later in the paragraph.

Commented [PW3]: That is one of several options.

Commented [PW4]: Not sure how this statement relates to the topic.

Ms. Maeve Clancy (USEPA) noted that air quality data from March 2020 posted to the Navy's website for the Parcel E Phase II project noted four days of non-detect (ND) concentrations for particulate matter/total suspended particulates (TSP) which is. Ms. Clancy (USEPA) said that a TSP ND result several days in a row is unusual in an urban area, and that TSP typically tracks with PM 10, but is higher, as PM 10 is a component of TSP. ~~unusual.~~ Ms. Liz Roddy (Navy) reached out to the contractor and there was an error in the laboratory data spreadsheet. The Navy will post a revised report and will conduct a corrective action report to explain the issue. Moving forward, the air monitoring reports will also include the wind direction. Ms. Clancy (USEPA) asked if they would continue to subtract the upwind from the downwind even on days where wind direction is variable or stagnant. Ms. Roddy (Navy) noted that the information will likely be documented in the field, but she assumes that the reports will continue to report upwind minus downwind. Ms. Clancy (USEPA) asked that the Navy's contractor include wind data in the report and consider the upwind vs. downwind when reviewing and reporting the pollutant data. The Navy will provide the BCT additional information regarding the subtraction of upwind vs. downwind in the air monitoring at Parcel E.

Mr. Praskins (USEPA) asked the Navy for the type of communication that the BCT will be receiving once the Parcel G fieldwork starts. The Navy is working to determine this and will report back to the BCT.

Regarding outstanding EPA comments on the Parcel G WPA Appendix E, Ms. Clancy (USEPA) noted that the USEPA thinks that the Navy should conduct quality assurance/precision checks using co-location of air monitoring equipment outside of regular fieldwork hours on a weekly basis, if an extra instrument isn't available. If there are only two continuous monitors at Parcel G, then one could be brought over on a regular basis to perform a quality check of the other operating air monitor. Ms. Clancy (USEPA) also noted the need for regular flow checks, and reminded the Navy that the 5,000 ug/m³ PM10 CalOSHA number was still in Table 1 of the Appendix for filter based monitoring and that it would be appropriate to add 50 ug/m³ to that part of the table.

V. Navy Contracting Process and FFA (Derek Robinson, Navy)

Mr. Robinson (Navy) noted that the Navy's cleanup budget is projected on a 30-year planning horizon, with solid budget numbers decided for the next 5 years, and then "locked in" at 3 years out. The Navy's budget is dependent on those projections, the ability to justify the projections, and the Navy's demonstrated use of their budget. The budget is also tied to the Federal Facilities Agreement (FFA) schedule. The Navy's budget is impacted if they aren't adhering to the FFA schedule and/or are not spending the money that has been allocated. If the Navy delays too much on the three-year basis, the Navy's budget can be adversely affected (i.e. reduced). Mr. Robinson (Navy) noted that this is one of the reasons why the Navy tries to stick to the schedule and work within the FFA process.

VI. Community Outreach (Derek Robinson, Navy)

Ms. Sanchez (USEPA) noted that Supervisor Walton reached out to the USEPA regarding an update on the fieldwork at HPNS. Ms. Sanchez (USEPA) noted that they would be happy to present along with the Navy. Mr. Robinson (Navy) also talked with Supervisor Walton and sent along some information and would be happy to meet to answer questions. Mr. Robinson (Navy) will send a follow-up email to see if there are any additional questions or concerns regarding the background soil study and how the results would be used.

Mr. Robinson (Navy) noted that the Navy will host a virtual community meeting for the HPNS residents on July 23, 2020 and sent out an email to the community announcing the meeting on July 9, 2020. The community update section of the Navy's website will also announce the meeting. Topics will include Parcel E and Building 253/211 fieldwork. Ms. Sanchez (USEPA) noted that Supervisor Walton reached out to the USEPA regarding an update on the fieldwork at HPNS. Ms. Sanchez (USEPA) noted that they would be happy to present along with the Navy. Mr. Robinson (Navy) also talked with Supervisor Walton and sent along some information and would be happy to meet to answer questions. Mr. Robinson (Navy) will send a follow-up email to see if there are any additional questions or concerns regarding the background soil study and how the results would be used. Ms. Sanchez (USEPA) noted that it's a federal requirement that meetings be transcribed and Mr. Robinson (Navy) noted that they are working on having a transcript or closed captioning for the upcoming meeting.

Commented [PW5]: Note that this statement is describing an action that occurred after the BCT meeting.

Ms. Sanchez (USEPA) asked the Navy to include in the community presentation some discussion of how the background data will be utilized in the upcoming fieldwork.

Ms. Nina Bacey (DTSC) asked about the Navy's response to stakeholders who petitioned for the reinstatement of the Restoration Advisory Board (RAB).

VII. New Action Items/Future Meetings (Derek Robinson, Navy)

- The Navy will provide weekly fieldwork updates to the BCT for Parcel C remedial actions.
- The Navy will request an extension for the Parcel D-1 Draft LUC RD to (at least) October 1, 2020.
- The Navy will request an extension to individual Parcel radiological rework work plans based on the priority review.
- The Navy will send DTSC a copy of the draft final Parcel E-2 remedial action completion report following the meeting.
- The Navy will report back to the BCT regarding the status of, and path forward for, the finalized Parcel C Phase II work plan.
- The Navy will provide a video of the dust generation activities and mitigation measures from soil sorting operations on Parcel E to the BCT.
- The Navy will provide additional information regarding the subtraction of upwind vs. downwind in the air monitoring data at Parcel E.
- The Navy will propose to the BCT their preferred method for communicating fieldwork updates to the agencies during the Parcel G rework.

Next Meetings:

- The next BCT meeting is scheduled to be held on August 6, 2020 via teleconference.

Meeting participants: (all participating via telephone)

Nina Bacey, DTSC	Sharon Ohannessian, Navy
Liz Basinet, INYA	Dennis Rourke, Navy
Karla Brasaemle, TechLaw	Wayne Praskins, USEPA
Amy Brownell, City	Christina Rain, Langan
John Chesnutt, USEPA	Derek Robinson, Navy
Maeve Clancy, USEPA	Liz Roddy, Navy
Derrick Coleman, INYA	Yolanda Sanchez, USEPA
Jamie Egan, Jacobs	Radhika Sreenivasan, E2 Consulting
Leslie Howard, Navy	Paul Stoick, Navy
Leo Larson, Navy	David Tanouye, Water Board
Tina Low, Water Board	Karen Ueno, USEPA
Sean-Ryan McCray, Navy	Heather Wochnick, Navy
Hamid Naimi, Navy	

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